

LAW OFFICES OF RONALD A. MARRON
ALEXIS WOOD (NV SBN 11523; CA SBN 270200)

alexis@consumersadvocates.com

RONALD A. MARRON (CA SBN 175650)

ron@consumersadvocates.com

KAS L. GALLUCCI (CA SBN 288709)

kas@consumersadvocates.com

651 Arroyo Drive

San Diego, California 92103

Telephone: (619) 696-9006

Facsimile: (619) 564-6665

Kevin L. Hernandez, Esq.

LAW OFFICE OF KEVIN L.

HERNANDEZ

2510 Wigwam Parkway, Suite 206

Henderson, Nevada 89074

T: (702) 563-4450

F: (702) 552-0408

kevin@kevinhernandezlaw.com

Attorneys for Plaintiff and the Proposed Class

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA – LAS VEGAS

RONNI PICHARDO, on behalf of herself, and
all others similarly situated,

Plaintiff,

v.

AMERIGROUP CORPORATION,

Defendant.

Case No.: 2:17-CV-00276-RFB-CWH

CLASS ACTION

**JOINT MOTION TO CONTINUE THE
HEARING ON PLAINTIFF'S MOTION
TO COMPEL [ECF 49] AND
CONTINUE THE DEADLINES IN
AMENDED DISCOVERY PLAN AND
SCHEDULING ORDER [ECF 36]**

1 The parties Ronni Pichardo (“Plaintiff”) and Defendant Amerigroup Corporation
2 (“Defendant”) hereby file a Joint Motion to Continue the Hearing on Plaintiff’s Motion to Compel
3 [ECF 49] and Continue the Deadlines in the Amended Discovery Plan and Scheduling Order [EC
4 36]. For the reasons stated herein, both Parties stipulate and respectfully request this Court continue
5 the current July 27, 2018 hearing date on Plaintiff’s Motion to Compel to August 16, 2018 and
6 additionally continue that deadlines included in the current Amended Discovery Plan and
7 Scheduling Order by sixty (60) days to allow for additional time to accommodate Defendant’s
8 request for a continued hearing date on Plaintiff’s Motion to Compel as well as accommodate
9 rulings and potential compliance on Plaintiff’s Motion to Compel [ECF 46] and Defendant’s
10 pending Motion to Dismiss [ECF 39] prior to the expiration of certain case deadlines.

11 WHEREAS, on May 7, 2018, Defendant filed a Motion to Dismiss Plaintiff’s First
12 Amended Complaint (*see* ECF 39) which is fully briefed;

13 WHEREAS, on May 29, 2018, Plaintiff filed a Motion to Compel certain discovery
14 responses from Defendant (*see* ECF 42);

15 WHEREAS, on June 19, 2018, this Court issued an Order denying Plaintiff’s Motion to
16 Compel without prejudice (*see* ECF 45);

17 WHEREAS, on June 19, 2018, Plaintiff filed a Renewed Motion to Compel (*see* ECF 46)
18 which is fully briefed;

19 WHEREAS, July 9, 2018, the Honorable Magistrate Judge Carl W. Hoffman issued a
20 Minute Order setting a hearing on Plaintiff’s Renewed Motion to Compel [ECF 46] on July 27,
21 2018 at 9:30 AM.

22 WHEREAS, on July 9, 2018, counsel for Defendant advised they were unavailable to attend
23 the hearing set on July 27, 2018 and provided Plaintiff’s counsel with alternative dates for the
24 hearing;

25 WHEREAS, on July 11, 2018, the Parties agreed to a mutually available date for a hearing
26 on Plaintiff’s Motion to Compel, August 16, 2018;

1 WHEREAS, as the request to extend the hearing date on Plaintiff's Renewed Motion to
2 Compel will delay a ruling on Plaintiff's Renewed Motion to Compel. Specifically problematic is
3 that Plaintiff's expert disclosure deadline is August 6, 2018, after the date requested by Defendant
4 for a hearing on Plaintiff's Renewed Motion to Compel. In Plaintiff's view, discovery requested
5 within Plaintiff's Renewed Motion to Compel is necessary to complete Plaintiff's expert disclosure
6 as well as file for class certification, a deadline which is currently set for September 24, 2018.
7 Additionally, a primary basis for Defendant's objections to providing class wide discovery to
8 Plaintiff is Defendant's pending Motion to Dismiss. Thus, a sixty (60) day continuance of all
9 deadlines included in the Amended Discovery Plan and Scheduling Order will assist the Parties in
10 receiving relevant rulings and necessary compliance accommodations, if any, prior to upcoming
11 deadlines;

12 THEREFORE, the Parties hereby stipulate to continue the following dates and deadlines:

- 13 • (1) The July 27, 2018, hearing on Plaintiff's Motion to Compel to August 16, 2018
14 at 9:30 AM;
- 15 • (2) The October 5, 2018, Close of Discovery deadline to December 4, 2018;
- 16 • (3) The August 6, 2018, Expert Disclosure deadline to October 5, 2018;
- 17 • (4) The September 7, 2018, Rebuttal Expert Disclosure deadline to November 6,
18 2018;
- 19 • (5) The August 6, 2018, Amend Pleading and Add Parties deadline to October 5,
20 2018;
- 21 • (6) The September 24, 2018, Dispositive Motion and Class Certification deadline to
22 November 30, 2018 (to accommodate the Thanksgiving holiday);
- 23 • (7) The December 10, 2018 Pretrial Order to February 8, 2019;

24 **IT IS SO STIPULATED.**
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2 Dated: July 12, 2018

By: s/Alexis M. Wood

3 **LAW OFFICES OF RONALD A. MARRON**

4 RONALD A. MARRON

5 ALEXIS M. WOOD

6 KAS L. GALLUCCI

651 Arroyo Drive

San Diego, California 92103

Telephone: (619) 696-9006

Facsimile: (619) 564-6665

8
9 **LAW OFFICE OF KEVIN L. HERNANDEZ**

2510 Wigwam Parkway, Suite 206

Henderson, Nevada 89074

Telephone: (702) 563-4450

Facsimile: (702) 552-0408

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11
12
13 *Attorneys for Plaintiff and the Proposed Class*

14
15 Dated: July 12, 2018

By: s/Virginia Bell Flynn

16 **TROUTMAN SANDERS LLP**

17 CHAD R. FULLER

VIRGINIA BELL FLYNN

11682 El Camino Real, Suite 400

San Diego, CA 92130

Telephone: (858) 509-6000

Facsimile: (858) 509-6040

20
21 **MESERVE, MUMPER & HUGHES LLP**

22 ANNA MARTIN

316 California Avenue, #216

Reno, NV 89509

Telephone: (775) 833-2269

Facsimile: (775) 833-2279

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26 *Attorneys for Defendant*

1 IT IS THEREFORE ORDERED that the hearing currently scheduled for Friday, July 27, 2018
2 at 9:30 a.m., is vacated. The hearing is rescheduled for August 27, 2018, at 9:30 a.m., in Las
3 Vegas Courtroom 3C before Magistrate Judge Carl W. Hoffman.

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UNITED STATES MAGISTRATE JUDGE

5 July 13, 2018

6 DATED: _____
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